

Framework for Managing E&P wastes at DEQ Regulated Solid Waste Facilities

Scope - applies to all types of exploration and production wastes with stipulations below.

Waste ID # - the DEQ should develop waste ID#s for tracking E&P wastes as appropriate.

Generator ID# - DEQ shall assign a generator ID for each “entity” (DECISION – should it be a separate ID for each site or a single number for each producing company – a single operator may have dozens of sites throughout year and adds paperwork burden for generator and DEQ)

Annual Generator Report – Generator shall submit annual industrial waste generator report (see issue of generator ID above).

Manifest - Generator shall complete DNR E&P waste manifest and include both DNR waste code and DEQ waste code #s.

Waste testing – Water based drilling muds require no testing prior to disposal. (Historical TCLP testing demonstrate these do not fail TCLP test). All other E&P wastes require testing at each time of generation. (DECISION on other E&P Wastes) Mixtures of water based drilling muds and other E&P waste types require testing. (DECISION – management of waste streams containing sulfur odor compounds – limited generation sites within LA – mostly an out of state import issue.)

Solid Waste Facility Criteria - E&P wastes can only be managed at Type 1 industrial solid waste facilities. No additional facility design requirements are necessary. Facility must apply to DEQ for a permit modification to receive authorization to accept such wastes. Facility can opt to receive authorization to receive a “subset” of E&P waste streams. Public comment opportunity must be afforded.

Regulatory Citation – Requirements should be placed in a single section (or subsection) with appropriate references to exact requirements in other chapters/sections. Would suggest a new chapter (or modifying Chapter 11 on Beneficial Reuse) for Special Waste Streams (this could encompass E&P waste, reuse of contaminated soils onsite, etc.). Need to also clean up existing language on E&P wastes in existing rules to facilitate this option.

